

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION**

Virginia Ankenbrand,

Plaintiff,

v.

Johnson & Johnson, *et al.*,

Defendants.

**MDL NO. 2738 (FLW) (LHG)**

Civil Action No.: 3:21-cv-03394-  
FLW-LHG

**UNOPPOSED MOTION TO  
AMEND SHORT FORM  
COMPLAINT AND FOR  
LEAVE TO FILE AMENDED  
SHORT FORM COMPLAINT**

Pursuant to Federal Rules of Civil Procedure, Rule 15, Plaintiff moves this Court for leave to amend her Complaint in the above captioned action and, in support, states as follows:

1. A party may amend her pleading by leave of court, and “[t]he court shall freely give leave when justice so requires.” Fed. R. Civ. P. 15(a).

2. A party may amend the pleadings as may be necessary and “at any time” “to conform them to the evidence and to raise an unpleaded issue.” Fed. R. Civ. P. 15(b).

3. Specifically, Plaintiff requests leave to amend her complaint to include the name and office information of Plaintiff’s co-counsel in this matter.

4. As discovery has not yet begun, there is no prejudice in the allowance of this amendment.

5. The proposed Amended Short Form Complaint is attached as Exhibit A.

6. Plaintiff has communicated with Defendant Johnson & Johnson seeking its assent to this motion. Defendant does not oppose this motion.

Respectfully submitted,

/s/Moshe Horn

Moshe Horn

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Dated: September 15, 2021

**CERTIFICATE OF SERVICE**

I certify that on September 15, 2021 the foregoing was filed electronically and notice of the filing will be sent to all required parties by operation of the Court.

/s/ Moshe Horn

Moshe Horn, Esq.